

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DR. THOMAS J. WYLY,

Plaintiff,

v.

Case No. 04-11151-EFH

THE INTERNATIONAL
FOUNDATION FOR EDUCATION
AND SELF-HELP and THE LEON H.
SULLIVAN FOUNDATION,

Defendants.

**AFFIDAVIT OF R. DANIEL BEALE IN SUPPORT OF
MOTION TO ADMIT PRO HAC VICE**

I, R. Daniel Beale, hereby declare as follows:

1. I am and have been a member in good standing of the bar of the State of Georgia and the State of Kentucky.


2. I am a partner at McKenna Long & Aldridge LLP, of Atlanta, Georgia, and am counsel to The Leon H. Sullivan Foundation, one of the defendants in this case. I am familiar with the facts and circumstances of the case.

3. No disciplinary proceedings or criminal charges have ever been instituted against me, nor are any disciplinary proceedings pending against me as a member of the bar in any jurisdiction. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice.

4. I promise to uphold the high standards of the Bar in this case.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the penalty of perjury.


R. Daniel Beale

Dated: October 11, 2004